Vitts Networks, Inc

Commonwealth of Massachusetts

Department of Telecommunications and Energy

DTE 99 – 271

Witness: Thomas Lyle

REQUEST: Department of Telecommunications
Dated: December 20, 1999

Item: Vitts RR 1-199.
For each xDSL compatible loop ordered with BA-Main November 1999, please provide the following:

PON Number
Date order was submitted
Date order rejected by BA-Ma
Date order was supplemented
Date of last FOC
Last due date given by BA-Ma
Date Ba-Ma delivered working loop
If loop was not delivered on or before the due date, please explain why.

REPLY: this information is proprietary in nature. As such, Vitts will submit information under a protective agreement.

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DTE 99 – 271

Witness: George Pratte
Infrastructure Technician

Thomas Lyle
Regulatory Affairs

REQUEST: Department of Telecommunications
Dated: December 20, 1999

Item: Vitts RR 1-203.
Can xDSL services be made to work on UDLC and IDLC. (a.) what are the parameters, speeds and conditions necessary to make services work over either UDLC and IDLC

REPLY: xDSL services can not be made to work when a particular customer is served by an IDLC system.

DSL systems are incompatible with xDSL services, in general, as the DLC electronics decrease the amount of data throughput to a maximum of 144Kbps. In particular, the presence of an IDLC system in the remote terminal serving the customer preempts xDSL services as the loop is terminated directly into the central office switch. As a result, there is not a physical means to re-direct the loop to a CLEC cage \ DSLAM. (see FCC 99-355, Line Sharing Order, Footnote 152)[1]

[1] *Id*. at para. 104. Digital loop carrier (DLC) systems digitally encode an individual voice channel into a 64 kilobit per second (kbps) digital signal, and aggregate, or "multiplex," the traffic from up to 24 subscriber lines into DS1 or higher signals to improve transmission efficiency and range. DS1 channels carry 1.544 megabits per second (Mbps) of data, the digital equivalent of 24 x 64 kbps analog voice channels. In a DLC system, analog signals are carried from the customer's premises to a remote terminal (RT), at which they are converted to digital information, multiplexed with other signals, and transported, generally through fiber facilities, to the LEC central office. Integrated digital loop carrier (IDLC) systems, a specific type of DLC system, establish a direct, digital interface

On the other hand, xDSL services can be provided over a UDLC system in the remote terminal. However, because of the limiting factors of the electronics in the UDLC gear, services are limited to a maximum of 144 kpbs. Vitts' customers, in many cases, demand higher speeds than 144 kbps.

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with the LEC central office switch, making it difficult, if not impossible, for requesting carriers to access individual loops at that location.

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Witness: Thomas Lyle
Regulatory Affairs

REQUEST: Department of Telecommunications
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Item: Vitts RR 1-208.
With regard to loop pre-qualification, when does Bell Atlantic- Mass return loop qualification information back to Vitts. (a.) what type of information is available on Bell Atlantic's WEB GUI.

Reply: The BA automated xDSL Loop pre-qualification system is such a meaningless process that Vitts personnel seldom request information through this database. BA has provided a "manual" that is supposed to guide CLEC users through the inquiry process. However, the information in this "manual" contains a number of undistinguishable codes and fields. Ultimately, users become frustrated with this time consuming process and either rely on a different database or submit an engineering query in a "last ditch" effort to obtain limited amounts of information about a particular loop.

If information is needed, Vitts can access the "Loop Qualification – Basic" database for premium loops. This information, however, is not very informative. It does not provide information about the loop length, presence of load coils or bridge taps, it does not reflect information about the types of repeaters or other disturbers, nor does it provide information about digital loop carrier systems.

In order to obtain some loop information, Vitts must submit an engineering query to the appropriate BA work center. Within 3 to 5 business days, information about a particular loop is manually retrieved and then forwarded to Vitts. However, Vitts is no better positioned to serve its customer in a timely manner than if Vitts personnel had just submitted the order in the first place and foregone the engineering query. An engineering query only results in unnecessary time delays. By just submitting the order, Vitts finds out within 3 to 5 business days whether or not a loop is xDSL compatible. If it is not, Vitts then calls the customer and

informs them of the BA situation and recommends alternative solutions. A process many customers find annoying as they are in need of advanced services greater than 144 kbps. Vitts asserts that information should be readily available prior to customers placing an order for a particular xDSL service so that customers are properly informed of the service options at the beginning of the sales cycle rather than at the end of the cycle.

Under FCC third report and order (FCC 99-238), BA is required to provide loop pre-qualification information to CLECs in the same manner that it provides information to itself in a non-discriminatory manner.

Under Rule § 51.319 (g) the FCC reaffirmed its requirement to make OSS an unbundled network element.

Rule § 51.319 (g) states:
Operations Support Systems: An incumbent LEC shall provide nondiscriminatory access in accordance with § 51.311 and section 251(c)(3) of the Act to operations support systems on an unbundled basis to any requesting telecommunications carrier for the provision of a telecommunications service. Operations support system functions consist of pre-ordering, ordering, provisioning, maintenance and repair, and billing functions supported by an incumbent LEC's databases and information. An incumbent LEC, as part of its duty to provide access to the pre-ordering function, must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent LEC.

Under § 51.5 Terms and definitions, Pre-ordering and ordering was defined by the FCC as:

Pre-ordering and ordering includes the exchange of information between telecommunications carriers about: current or proposed customer products and services; or unbundled network elements, or some combination thereof. This information includes loop qualification information, such as the composition of the loop material, including but not limited to: fiber optics or copper; the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, disturbers in the same or adjacent binder groups; the loop length, including the length and location of each type of transmission media; the wire gauge(s) of the loop; and the electrical parameters of the loop, which may determine the suitability of the loop for various technologies.

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Item: Vitts RR 1-211
How many times has Bell Atlantic-Mass not been able to condition loops within 3 to 5 business days.

REPLY: Month to date, Vitts has ordered 58 xDSL loops, of which 20 orders have been delayed for various reasons ranging from the presence of disturbers, DLC or other circuit troubles. Delays, in this context, are those occasions when Vitts has received due dates from Bell Atlantic only to discover on the due date that Vitts technicians can not turn up the facility for the above referenced reasons. Vitts prefers to be notified of possible delays due to line quality problems prior to rolling a truck.

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Item: Vitts RR 1-213
How many times has Vitts had to downgrade services to an IDSL (144 kbps) service due to the presence of digital loop carrier systems.

REPLY: Vitts is unable to respond to this request at this time.